

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

UNITED STATES OF AMERICA,
Plaintiff,

vs.

Case No.16-CR103-JDP

PATRICK S. SWEENEY,
Defendant.

MOTION TO SEAL PACKET OF LETTERS FOR SENTENCING

Defendant Patrick S. Sweeney, by his undersigned attorney, Christopher T. Van Wagner, respectfully moves to allow Sweeney to file a packet of “Letters for Sentencing” under seal. As the principal ground for this request, Sweeney notes that many of these collected letters discuss a serious mental health condition suffered by Sweeney’s minor son, MKS. (That information is also noted, in brief detail, in the presentence report, which IS sealed.) To allow these letters to remain unsealed and thereby become a part of the public record would compromise and impinge on that minor son’s own privacy rights. For that reason, we ask that they be filed under seal.

Dated at Madison, Wisconsin, November 14, 2017.

Respectfully submitted,
PATRICK S. SWEENEY, Defendant

/s/ (electronically signed)

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